## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RAFIA GROOMS, individually and as

v

administratrix for the Estate of SONTOSH

CLARKE : CIVIL ACTION

Plaintiff

:

No. 10-CV-5178

BRITTON BROWN :

Defendant

## PLAINTIFF RAFIA GROOM'S PROPOSED VERDICT SLIP.

Plaintiff Rafia Grooms by and through her undersigned counsel submits the attached proposed verdict slip for use at the trial of this matter.

LAW OFFICE OF JOHN N. RIGHTMYER

Dated: 3/13/2013 BY: /s/ jnr8215

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Counsel for Rafia Grooms, Administratrix for the Estate of Sontosh Clarke

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RAFIA GROOMS, individually and as administratrix for the Estate of SONTOSH CLARKE	: : : CIVIL ACTION	
Plaintiff	: CIVILACTION	
V	: : No. 10-CV-5178	
BRITTON BROWN Defendant	: : :	
<u>VERDI</u>	CT SLIP	
I. LIABILITY		
<b>A.</b> Was it necessary for Britton Brown to Clarke's escape?	o use deadly force to prevent Sontosh	
YES NO		
<b>B.</b> Did Britton Brown have probable cau significant threat of serious physical injur	use to believe that Sontosh Clarke posed a ry to anyone at the time of the shooting?	
YES NO		
<ul><li>C.</li><li>1. Was it feasible for Britton Brown to g shooting him?</li></ul>	ive Sontosh Clarke a warning before	
YES NO		
<b>2.</b> Did Britton Brown fail to give a warm him?	ing to Sontosh Clarke before shooting	
YES NO		

IF YOUR ABOVE ANSWER TO QUESTIONS I.A. OR I.B. IS "NO", OR IF YOU ANSWER "YES" TO BOTH PARTS OF QUESTION I.C., THEN PROCEED TO ANSWER QUESTION II. ON THE NEXT PAGE.

IF YOU ANSWERED "YES" TO QUESTIONS I.A. AND I.B., AND YOU ANSWERED "NO" TO EITHER PART OF QUESTION I.C., THEN YOUR DELIBERATIONS ARE OVER, HAVE THE FOREPERSON YOU SELECTED SIGN AND DATE THE VERDICT SLIP ON THE LAST PAGE. ADVISE THE COURTROOM DEPUTY THAT YOU HAVE COMPLETED YOUR DELIBERATIONS.

## II. COMPENSATORY DAMAGES.

A. State the total amount of compensatory damages you award to the Estate of Sontosh Clarke for the loss of his life, including all injury, disfigurement, pain, suffering, fear, humiliation and mental anguish he suffered before death:	
\$	
B. State the total amount of compensatory damages you award to the Estate of Sontosh Clarke for economic losses including the cost of his funeral and burial medical bills incurred in treating him before his death, and the present value of lost future wages and benefits, and the present value of any future services he might have provided Rafia Grooms:	, the
\$	
PROCEED TO QUESTION III.	
III. PUNITIVE DAMAGES.	
A. Do you find that Britton Brown's acts and conduct warrant the award of punitive damages?	
YES NO	
IF YOUR ABOVE ANSWER TO QUESTION III.A. IS "YES", THEN PROCEED TO ANSWER QUESTION III.B. BELOW.	
IF YOU ANSWERED "NO" TO QUESTION III.A. THEN YOUR DELIBERATIONS ARE OVER. HAVE THE FOREPERSON YOU SELECTED SIGN AND DATE THE VERDICT SLIP ON THE LAST PACADVISE THE COURTROOM DEPUTY THAT YOU HAVE COMPLETE YOUR DELIBERATIONS.	
B. State the total amount of punitive damages you award to the Estate of Sonto Clarke	sh
\$	

FOREPERSON	DATE	